

# EXHIBIT A

 <p>Court's Address and Phone Number: Camden Special Civil Part 101 South Fifth Street Camden, NJ, 08103 Telephone No. (856) 379-2200</p>	14	Superior Court of New Jersey Law Division, Special Civil Part Camden County Docket No: DC <u>002136-16</u>
	ON	Civil Action <b>SUMMONS</b>
	10A	Check one <input type="checkbox"/> Contract <input checked="" type="checkbox"/> Tort

**YOU ARE BEING SUED!**

Person or Business Suing You (Plaintiff)	Person or Business Being Sued (Defendant)										
<input type="checkbox"/> Cash <input checked="" type="checkbox"/> Check Bridget Pulley Fee Paid & Entire MAR 3 - 2016	Quality Asset Recovery 7 Foster Ave, Suite 101 Gibbsboro, NJ, 08026										
(See the following page(s) for additional plaintiffs) <u>897</u>											
Plaintiff's Attorney Information	The Person or Business Suing You Claims You Owe the Following:										
RC Law Group- Yaakov Saks, Esq. 285 Passaic Street Hackensack, NJ, 07601	<table border="1"> <tr> <td>Demand Amount</td> <td>\$ 10,000.00</td> </tr> <tr> <td>Filing Fee</td> <td>\$ 75.00</td> </tr> <tr> <td>Service Fee</td> <td>\$ 7.00</td> </tr> <tr> <td>Attorney's Fees</td> <td>\$</td> </tr> <tr> <td><b>TOTAL</b></td> <td>\$ 10,082.00</td> </tr> </table>	Demand Amount	\$ 10,000.00	Filing Fee	\$ 75.00	Service Fee	\$ 7.00	Attorney's Fees	\$	<b>TOTAL</b>	\$ 10,082.00
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<b>TOTAL</b>	\$ 10,082.00										

**FOR JUDICIARY USE ONLY**

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

**IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE 04/18/2016, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:**

1. **Answer the complaint.** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Clerk's Offices or on the Judiciary's Internet site [www.njcourts.com](http://www.njcourts.com) under the section for Forms. If you decide to file an answer to the complaint made against you:
  - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: *Treasurer, State of New Jersey*. Include **DC 002136-16** (your Docket Number) on the check.
  - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
  - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before 04/18/2016.
2. **Resolve the dispute.** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the **SIGNED** agreement to the court's address listed above on or before 04/18/2016.

**Please Note - You may wish to get an attorney to represent you.** If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at 856-964-2010. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at 856-482-0618. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Name	Nalo Brown Acting Deputy Clerk of the Superior Court
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 <p>Dirección y teléfono del tribunal:  Parte Civil Especial de <u>Camden</u>  <u>101 South Fifth Street</u>  <u>Camden, NJ, 08103</u>    Número de teléfono: <u>(856) 379-2200</u></p>	<p><b>El Tribunal Superior de Nueva Jersey</b>  <b>División de Derecho, Parte Civil Especial</b>  Condado de <u>Camden</u>  Número del expediente: DC _____</p> <p><b>Demandada de Acción Civil</b>  <b>NOTIFICACIÓN DE DEMANDA</b></p> <p>Marque si es <input type="checkbox"/> Contrato <input checked="" type="checkbox"/> Ilícito Civil</p>										
¡LE ESTÁN DEMANDANDO!											
<p><b>Persona o entidad comercial que le está demandando (el demandante)</b></p> <p>El Demandante: Consigne la información al dorso.  (Vea en la(s) página(s) siguiente(s) los demandantes adicionales)</p> <p><b>Información sobre el abogado del demandante</b></p> <p>El Demandante: Consigne al dorso la información sobre el abogado del demandante.</p>	<p><b>Persona o entidad comercial que está siendo demandada (el demandado)</b></p> <p>El Demandante: Consigne la información al dorso.  (Vea en la(s) página(s) siguiente(s) los demandados adicionales)</p> <p><b>La persona o entidad comercial que le está demandando afirma que usted le debe lo siguiente:</b></p> <table border="0"> <tr> <td>Cantidad a la vista</td> <td>\$XXXXXXX</td> </tr> <tr> <td>Tasa judicial</td> <td>\$XXXXXXX</td> </tr> <tr> <td>Cargo del emplazamiento</td> <td>\$XXXXXXX</td> </tr> <tr> <td>Honorarios del abogado</td> <td>\$XXXXXXX</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>\$XXXXXXX</b></td> </tr> </table>	Cantidad a la vista	\$XXXXXXX	Tasa judicial	\$XXXXXXX	Cargo del emplazamiento	\$XXXXXXX	Honorarios del abogado	\$XXXXXXX	<b>TOTAL</b>	<b>\$XXXXXXX</b>
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<b>TOTAL</b>	<b>\$XXXXXXX</b>										
<b>PARA USO EXCLUSIVO DEL PODER JUDICIAL</b>											
<p>En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. Si usted no responde a la demanda, puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado. Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.</p> <p><b>SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL _____, O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:</b></p> <ol style="list-style-type: none"> <li><b>Responder a la demanda.</b> Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial <a href="http://www.njcourts.com">www.njcourts.com</a> bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra: <ul style="list-style-type: none"> <li>Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya el número <b>DC</b> _____ (el número de su expediente) en el cheque.</li> <li>Envíe por correo el formulario de Repuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.</li> <li>Entregue personalmente o envíe por correo común una copia del formulario de Repuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el _____.</li> </ul> </li> <li><b>Resolver la disputa.</b> Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. Si llegara a un acuerdo, envíe por correo el acuerdo <b>FIRMADO</b> a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el _____.</li> </ol> <p>Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al _____. Si usted puede pagar un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al _____. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.</p>											
<i>/s/ Nombre y apellido</i> _____ Subsecretario(a) interino(a) del Tribunal Superior											





Court's Address and Phone Number:  
 Camden Special Civil Part  
 101 South Fifth Street  
 Camden, NJ, 08103  
 \_\_\_\_\_  
 (856) 379-2200

Superior Court of New Jersey  
 Law Division, Special Civil Part  
 Camden County  
 Docket No: DC: -002136-16

**Civil Action  
SUMMONS**

Check one  Contract  Tort

**Additional Plaintiffs/demandantes adicionales**

**Additional Defendants/demandados adicionales**



**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION SPECIAL CIVIL PART  
CAMDEN COUNTY**

Bridget Pulley

Plaintiff,

Docket No: DC-002136-16

**COMPLAINT**

-v.-

Quality Asset Recovery

Defendant.

Plaintiff Bridget Pulley (“Plaintiff” or “Pulley”) by and through her attorneys, RC Law Group, PLLC, as and for its Complaint against Defendant Quality Asset Recovery (“Defendant” or “QAR”) respectfully sets forth, complains and alleges, upon information and belief, the following:

**INTRODUCTION/PRELIMINARY STATEMENT**

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of section 1692 et. seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act (“FDCPA”).

**PARTIES**

2. Plaintiff is a resident of the State of New Jersey, County of Hudson, residing at 35 E 17th Street, Bayonne, NJ 07002.

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3. Defendant is a debt collector with an address at 7 Foster Ave., Suite 101, Gibbsboro, NJ 08026.
4. Quality Asset Recovery is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA.

#### JURISDICTION AND VENUE

5. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15 U.S.C. § 1692 et. seq. and 28 U.S.C. § 2201. If applicable, the Court also has pendant jurisdiction over the State law claims in this action pursuant to 28 U.S.C. § 1367(a).

6. Venue is proper in this judicial district pursuant under N.J.S.A. 6:1-3(a), because the acts and transactions occurred here, and Defendants transact business here.

#### FACTUAL ALLEGATIONS

7. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

8. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").

9. This debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

10. The reporting of a debt to a credit reporting agency by a debt collector is a communication covered by the FDCPA.



11. Defendant reported the Alleged Debt on the Plaintiff's credit report.

12. Plaintiff disputed the Alleged Debt directly with the Defendant with a dispute letter  
on July 15, 2015.

13. Plaintiff examined her credit report again on December 28, 2015 and found that  
Defendant had re-reported the credit account to the bureau(s) in November 2015. When  
Defendant re-reported the credit account after it received Plaintiff's dispute letter, Defendant  
failed to list the account as "disputed by consumer" despite being required to do so by the  
FDCPA.

14. As a result of Defendant's deceptive, misleading and unfair debt collection  
practices, Plaintiff has been damaged.

**FIRST CAUSE OF ACTION**  
**(Violations of the FDCPA)**

15. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as  
though fully state herein with the same force and effect as if the same were set forth at length  
herein.

16. Defendant's debt collection efforts attempted and/or directed towards Plaintiff  
violate various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692d,  
1692e(2), 1692e(5), 1692e(8), and 1692f.

17. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged  
and is entitled to damages in accordance with the FDCPA.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff Bridget Pulley demands judgment from the Defendant Quality Asset Recovery, as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3);
- d) A declaration that the Defendants practices violated the FDCPA; and
- e) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

Dated: Hackensack, New Jersey  
February 25, 2016

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**RC Law Group, PLLC**  
By: Yaakov Saks, Esq.  
285 Passaic Street  
Hackensack, NJ 07601  
Phone: 201.282.6500 ext. 201  
Fax: 201.282.6501



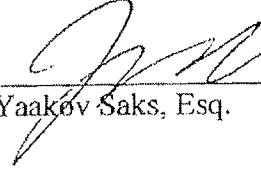
### Rule 4:51-1 Certification

The undersigned attorney for the plaintiff certifies that the matter in controversy is not the subject of any other action pending in any Court or a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I certify that confidential person identities have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7b.

### **Certification**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 2/25/2016

Signature: 

Yaakov Saks, Esq.